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20 UNITED STATES DISTRICT COURT  
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF  
24 GOVERNMENT EMPLOYEES, AFL-CIO;  
25 AMERICAN FEDERATION OF STATE  
26 COUNTY AND MUNICIPAL EMPLOYEES,  
27 AFL-CIO; et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF MICHAEL GARL**

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I, Michael Garl, hereby declare as follows:

1. I am a member and the Vice President of NFFE Local 34 and an Engine Captain in the United States Forest Service ("USFS"). I make this statement based on personal knowledge, information, and belief and if called as a witness could and would testify competently thereto.

2. I have worked for the USFS since 2015 and have been an Engine Captain since 2022. In my role as Engine Captain, I oversee a six-person engine crew for a wildland firefighting-specific engine in the Mount Baker-Snoqualmie National Forest ("Forest") in Washington. The Mount Baker-Snoqualmie National Forest extends more than 140 miles along the western slopes of the Cascade Mountains from the Canadian border to Mount Rainier National Park, covers more the 1.7 million acres, and is the most visited national forest in the country. My main task in the Forest, along with my crew, is to suppress wildfires. I have responsibility for my engine crew, and also work with other suppression modules and USFS staff to coordinate fire suppression efforts.

3. In February 2025, USFS terminated approximately 35 employees, which is nearly 40% of the staff working in the Forest. In total, the state of Washington lost approximately 125 USFS employees. My understanding is that these terminations were done at the direction of the Office of Personnel Management ("OPM"). These terminations will have a severely detrimental impact on USFS's ability to provide critical services to the public and to maintain its fire suppression efforts.

4. USFS has been underfunded and understaffed for years, and the Forest often worked with a skeleton crew of employees that was supplemented by seasonal workers during the busy season. Recently, several of these temporary employees were converted to permanent workforce employees to provide Mount Baker-Snoqualmie National Forest and the USFS, as a whole, with a more stable and durable workforce. In addition, many existing permanent career employees had recently accepted promotions that placed them in probationary status. As a result, the indiscriminate terminations have devastated the USFS workforce. Those terminations include recreation and trails employees,

1 administrative employees, timber sale employees, wilderness rangers, biologists, and visitor  
2 information service employees, among others. Given the already-limited staffing, many of the  
3 terminated employees were jack-of-all trades types who performed several different tasks depending  
4 on need.

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6 5. The termination of probationary employees has had a particularly negative impact on  
7 the safety of the Forest. Many of the probationary employees who were terminated provided critical  
8 services such as regulation enforcement (Forest Protection Officers), public education, removal of  
9 hazard trees threatening trail and campground users hanging of signage, maintenance of front and  
10 backcountry recreation sites, assistance of distressed forest users, fire prevention and detection, litter  
11 removal, forest pass sales, providing users with critical weather and trails conditions, and regular bridge  
12 and facility inspections. These employees worked in the field and enabled USFS to adequately manage  
13 and maintain the vast range of the Forest and to protect the public.

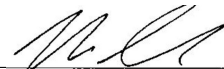
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15 6. For example, every wilderness ranger in the Forest was terminated. As a result, there  
16 are no rangers left to patrol the backcountry. These employees were the first point of contact if a  
17 member of the public were to get injured or lost on forest land. They also performed other critical  
18 public safety roles, such as enforcing fire bans.

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20 7. The termination of probationary employees has also had a hugely negative impact on  
21 USFS's ability to fight fires. Many of the terminated probationary employees were also qualified  
22 firefighters who were able to serve in that capacity as necessary during fire season. The Forest was  
23 already operating on a skeleton crew basis; without that assistance, USFS will have a severely  
24 diminished capacity to fight forest and brush fires. In addition, many of the terminated probationary  
25 employees were the ones out in the backcountry who would respond to and locate fire hazards such as  
26 abandoned campfires, lightning strikes, and other emerging fires. Given the size of the Forest, this  
27 early notice is critical. The Forest only has four fire engines, and there are times when a budding fire  
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1 may be several hours away from the nearest engine. Having employees who are able to notify the  
2 engine crews early and potentially begin suppression efforts can give USFS a several-hour head start  
3 in fighting fires, but that is not possible after the indiscriminate terminations.

4 8. The terminations have also caused communication and information breakdowns among  
5 the employees and supervisors at the Forest. Local 34 has typically had a good working relationship  
6 with Forest management, and communication was not an issue among employees or between  
7 management and the Union. However, my understanding is that OPM directives have changed the  
8 ways in which information is distributed, leading to confusion and uncertainty among the remaining  
9 employees and breakdowns in communication between employees and management. This seemingly  
10 targeted effort to disrupt communication has only further impeded the ability of employees to perform  
11 their jobs, which are critical to public safety and enjoyment of the Forest.  
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13 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
14 and correct. Executed on March 6, 2025, in Seattle, Washington.  
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